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21 Attorneys for Plaintiff Dustin Gaj

22 UNITED STATES DISTRICT COURT  
23 DISTRICT OF NEVADA

24 DUSTIN GAJ, Derivatively on Behalf of ) Case No. 2:19-cv-00505-KJD-CWH  
25 WYNN RESORTS, LTD., )  
26 Plaintiff, ) **STIPULATION TO EXTEND BRIEFING**  
27 v. ) **SCHEDULE**  
28 ) **(FIRST REQUEST)**  
29 STEPHEN A. WYNN, MATTHEW )  
30 MADDOX, KIMMARIE SINATRA, D. )  
31 BOONE WAYSON, ALVIN V. )  
32 SHOEMAKER, JOHN J. HAGENBUCH, )  
33 ROBERT J. MILLER, RAY R. IRANI, )  
34 PATRICIA MULROY, CLARK T. )  
35 RANDT, JR., JAY L. JOHNSON, MARC )  
36 D. SCHORR, J. EDWARD VIRTUE, )  
37 STEPHEN COOTEY, and CRAIG S. )  
38 BILLINGS, )  
39 Defendants, )  
40 -and- )  
41 WYNN RESORTS, LTD., a Delaware )  
42 Corporation, )  
43 Nominal Defendant. )

1        This is the first stipulation to extend the briefing schedule for defendant Marc D. Schorr's Motion  
2 to Dismiss Complaint (Doc No. 67).

3        WHEREAS, on June 25, 2019, plaintiff Dusitn Gaj ("Plaintiff") and all defendants except  
4 defendant Marc D. Schorr ("Schorr") submitted a stipulation setting forth the following briefing schedule  
5 regarding motions to dismiss: (1) defendant Stephen Coote ( "Coote") may file a response to the  
6 complaint on or before June 26, 2019; (2) defendant Kimmarie Sinatra ("Sinatra") may file a response to  
7 the complaint on or before July 8, 2019; and (3) Plaintiff shall file an omnibus opposition to the already  
8 pending motions to dismiss and any motions to dismiss (Doc. Nos. 56 and 53) filed by Coote or Sinatra  
9 on or before August 8, 2019, and defendants (with the exception of defendant Schorr) shall file their  
10 replies by September 2, 2019 (the "Scheduling Stipulation") (Doc. No. 51);

11        WHEREAS, on June 28, 2019, the Court approved and entered the Scheduling Stipulation (Doc.  
12 No. 55);

13        WHEREAS, prior to the entry of the Scheduling Stipulation, counsel for defendant Schorr had not  
14 yet appeared as counsel or accepted service;

15        WHEREAS, on July 10, 2019, defendant Schorr filed the Stipulation Regarding Acceptance of  
16 Service By Marc D. Schorr ("Service Stipulation") (Doc. No. 62);

17        WHEREAS, on July 16, 2019, the Court granted the Service Stipulation (Doc. No. 65);

18        WHEREAS, on July 18, 2019, defendant Schorr filed: (1) a motion to dismiss (Doc. No. 67); and  
19 (2) a notice of joinder in the Wynn Resort Defendants' and defendant Sinatra's motions to dismiss (Doc.  
20 No. 68) (together, "Defendant Schorr's Motion to Dismiss");<sup>1</sup>

21        WHEREAS, Plaintiff and defendant Schorr respectfully submit that a unified briefing schedule  
22 will serve judicial efficiency and conserve resources; and

23        WHEREAS, Plaintiff's counsel and defendant Schorr's counsel have met and conferred and agree  
24 that briefing on Defendant Schorr's Motion to Dismiss shall be on the same schedule as that for all other  
25 defendants;

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27        <sup>1</sup> "Wynn Resort Defendants" refers to defendants Matthew Maddox, D. Boone Wayson, Alvin V.  
28 Shoemaker, John J. Hagenbuch, Robert J. Miller, Ray R. Irani, Patricia Mulroy, Clark T. Randt, Jr., Jay  
L. Johnson, J. Edward Virtue, Craig S. Billings, and nominal defendant Wynn Resorts, Ltd.

1 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiff and defendant  
2 Schorr, through their respective counsel of record, as follows:

3 1. Plaintiff's opposition to Defendant Schorr's Motion to Dismiss shall be incorporated into  
4 his omnibus opposition to be filed on or before August 8, 2019, pursuant to the Scheduling Stipulation;  
5 and

6 2. Defendant Schorr shall file his reply on or before September 2, 2019.

7  
8 Dated: July 29, 2019

Respectfully submitted,

9 /s/ Steven R. Wedeking  
10 STEVEN R. WEDEKING  
11 ASHLEY R. RIFKIN  
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22 Dated: July 29, 2019

23 /s/ Richard A. Schonfeld

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28 Attorney for Defendant Marc D. Schorr

1 IT IS SO ORDERED.  
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Dated: August 1, 2019  
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HONORABLE KENT J. DAWSON  
UNITED STATES DISTRICT JUDGE